Attachment 6 to Exhibit 2

Integration and Diversification Statement of Mark and Renee Carter

BEFORE THE

Federal Communications Commission

WASHINGTON, D.C. 20554

In Re: Applications of) MM Docket No. 93-178
HOWARD B. DOLGOFF	File No. BPH-911223ME
and	
MARK AND RENEE CARTER	File No. BPH-911224MD
For Construction Permit for a New FM Station on Channel 292A in Miramar Beach, Florida) } }
To the Honorable John M. Frysiak	

INTEGRATION AND DIVERSIFICATION STATEMENT

Pursuant to Section 1.325(c)(2) of the Commission's Rules, Mark and Reneé Carter hereby submit their integration and diversification statement.

Integration

- 1. Ownership Structure: Mark and Reneé Carter are two individuals proposing station operations in their individual capacities.
- 2. <u>Full Time 100% Integration</u>: Mark and Reneé Carter both will work full time, 40 hours or more per week at the station.
- 3. <u>Duties of Integrated Owners</u>: Mark Carter will assume the position of General Manager/Sales Manager with the daily duties of station management, strategic planning, management and recruitment of sales staff, account sales, commercial copywriting, and commercial production. Reneé Carter

will assume the position of Program Director/Business Manager with the daily duties of program planning, format execution, music and playlist logging and rotation, daily program logs, all sales billing, payroll and all bookkeeping responsibilities.

- Responsibilities: Currently Mark and Reneé Carter are self-employed. Both are involved with leasing and maintaining a broadcast tower facility. This self-employment takes Mark approximately 3 hours per week, and Reneé approximately 2 hours per week. Thus, these responsibilities can continue while operating the station in a full-time capacity.
- 5. 50% Female Preference: Should the Commission's reconsideration of its integration policy lead to a reintroduction of the female preference, the Carters should be credited with a 50% female preference based on Reneé Carter's gender. 1
- 6. 100% Local Residency: Mark and Reneé are longtime residents within the principal service contour of their station's proposed service area. Mark Carter has been a local resident from 1973-1980 and from 1983 to present. Reneé Carter has been a local resident from 1960-1963, 1965-1980, and 1983 to present.

The basis in the original application for Reneé's claim of a minority preference at that time was due to the understanding that women as applicants were considered to be "minorities." While both Mark and Reneé have some American Indian heritage (1/8 each), they feel this does not meet the Commission's requirements as true minority status.

7. 100% Participation in Civic Activities: Both Mark and Reneé Carter have extensive records of civic involvement in and around the community of license. The following list is a detailed description of civic activities through December 1991.

Mark Carter

1985-1988	Member of the Walton County Chamber of Commerce
1986-1988	Board of Directors, Walton County Chamber of Commerce.
1985-1988	Volunteer on Publicity Committee for the Chautauqua Festivals held in May of each year. Handled writing, production, and distribution of radio and television promotional ads to generate awareness and attendance of each event.
1985-1988	Volunteer and Group Captain of South Walton Membership Drivesuccessful in creating the greatest increase in new membership to the Chamber.
1985-1988	Worked closely with Executive Director Ruby Rivard in producing a weekly Chamber radio awareness campaign that was distributed and aired throughout the county.
1985-1986	Board of Director/Member of the Emerald Coast Tourist Development Councilformed to develop strategy in promoting the Miramar Beach/Destin/Ft. Walton Beach area as a tourist destination.
1985-1987	Member of the Destin Chamber of Commerce
1985-1988	Involved with fundraising effort for the Destin Fishing Rodeo and sponsored the Dolphin Award.
1983-1991	Volunteer Speaker for Dr. Edward Freese, professor at Okaloosa/Walton Community College. Was called upon to speak for one hour both in the fall and spring semester of each year about broadcasting, radio production, and careers in radio and television to his media class of about 30.
1986-1991	Officer/Board Member/Volunteer for Chautauqua Offices of Psychotherapy and Evaluation (C.O.P.E. Center) which is Walton County's full-service

community mental health center employing over 90 people and a yearly budget of almost \$2 million dollars.

1987-1988 Vice-President of the C.O.P.E. Board of Directors

1988-1991 President of the C.O.P.E. Board of Directors

1985-1991 Chairman of Fundraising Committee and responsible for yearly fundraising efforts including a charity dance, fun run, cookbook origination and sales, community telemarketing, and other yearly fundraising efforts.

1988-1991 Member of Building Committee and involved with property site selection, planning, designing, and opening of the C.O.P.E. Center's Outpatient Clinic on Highway 331 in DeFuniak Springs.

1989-1991 Walton County Board President representative to the monthly District One Alcohol, Drug, and Mental Health meetings held in Pensacola to discuss problems with state funding, site evaluation, and improved program implementation to better serve clients in Walton County (Miramar Beach).

1986-1991 Writer, Producer, Director of C.O.P.E. Center video productions used for community awareness and employee training purposes. Final edited production on each was approximately thirty minutes and was aired on local TV station.

1986-1991 Writer, Producer, Announcer of C.O.P.E. Center radio campaign which dealt with drug and alcohol abuse, child abuse, marriage counseling, teen suicide, and the Help Line. Distributed radio announcements to all area radio stations and campaign resulted in greater service awareness to citizens in Miramar Beach area.

1985 Coordinator and Production Volunteer for C.O.P.E. video production of three public service announcements produced by WKRG-TV in Mobile, AL. Post-production involved a two-hour drive to Mobile to attend editing session. Assisted with air schedule purchasing of announcements and documentation of promotional schedule. Production and schedule paid for by a state grant.

1988-1991 Organized C.O.P.E. Center's Community Advisory Council and attended quarterly meetings for

community input on needs of the people of Walton County.

Organized Successful Opening of C.O.P.E. miramar
Beach Mental Health office in South Walton County.
Negotiated long-term building lease in return for
in-kind donation and assisted with media campaign
to make public aware of new office in South Walton

County.

1990 Designed HELP LINE billboard and negotiated price, materials, and supervised its installation on Highway 331 South with LaMar Outdoor Advertising.

1990-91 Produced, installed, and maintained C.O.P.E. Center's Information on Hold feature on their main telephone system allowing callers to be informed of all C.O.P.E. services while on hold. Audio was updated on a monthly basis.

1988-1991 S.T.A.R. (Students Taking Active Responsibility)
Program Volunteer and Coordinator -- STAR is an
acclaimed state-wide program for elementary and
middle school students that teaches drug
prevention, alternatives to peer pressure, and
healthy lifestyles.

S.T.A.R. Parent Volunteer--assisted with classroom instruction and special projects of anti-drug student video production. "Drugbusters", which was produced in 1989 at Walton Middle School was both shown at the State Drug Convention in 1989 as well as all Walton County middle schools which incorporate the S.T.A.R. program.

Assisted in formation of S.T.A.R. Grant writing proposal to the State of Florida and produced a ten-minute program overview video to accompany the application.

S.T.A.R. Volunteer and Producer/Director of S.T.A.R. video "Live To Tell", produced at Bay Elementary School. The dramatic 45-minute production was shown in Walton County elementary and middle schools are part of their drug prevention program.

University of West Florida Small Business
Development Center--Volunteered as part of a
Media/Student project where students interview the
needs and develop a complete media advertising
campaign for a local radio station complete with

lasted for three months. 1985-1991 Volunteer at Bay Elementary School. Member of Bay Elementary School PTA organization. 1985-1991 Vice-President of Bay Elementary School PTA. 1988-1990 President of Bay Elementary School PTA. 1990-1991 Fundraising Volunteer for Bay Elementary School on 1985-1991 following projects: Fall Carnival 1985-1991, Bay Auction 1988-1991, Christmas Program 1990-1991, Bay Yearbook 1989-1990, Bay Cookbook 1991, and other fundraising efforts. Volunteered to install school-wide closed circuit 1990 TV system providing education programming access to all classes. Volunteer/Parent Coordinator of Bay-TV, the 1990-1991 student produced morning TV program aired daily in the school. Volunteered for 2-4 hours daily (Monday-Friday) and organized a radio/TV instruction workshop daily for Bay Elementary fifth and sixth graders. Volunteer and Co-Producer of student produced 1990 Christmas video entitled: "Christmas At Eden" taped at a local historic mansion with the entire student body's involvement. Copies of the finished video were sold and over \$1000 was raised for purchase of audio/video supplies for the school. 1991 Negotiated, help transport, and install satellite TV dish and receiver for school to enhance educational programming via closed-circuit TV system. Installed wiring for new channel and relocated student studio and equipment. 1991 Volunteer-- "Breakfast With Bay"--helped organize and work a day long community awareness breakfast and tour of school involving local business people. Conducted own tour group through school including extensive question and answer session with community leaders.

logo design and television commercials. Project

1988-1991	Classroom Volunteer at Bay Elementary School.
1990	Organized Field Trip to State Capitol for all Bay Elementary 4th Graders. Arranged for local funding, set up itinerary, and helped supervise day-long educational outing.
1991	Walton County United Way Volunteer-assisted with the South Walton Committee in fundraising and public speaking at area businesses to employees.
	Reneé Carter
1987-1991	Fundraising Volunteer for Chautauqua Offices of Psychotherapy and Evaluation (C.O.P.E. Center) which is Walton County's community mental health center.
1987-1988	Volunteer/Organizer for the C.O.P.E. Center's Annual Big Band Dance Charity Event.
1989	Volunteer/Organizer for the C.O.P.E. Center Cookbook fundraiser. Volunteered to "piece" together book by organizing recipes submitted by C.O.P.E. employees and assist with cookbook design and layout.
1985-1991	Volunteer at Bay Elementary School
1985-1991	Fundraising Volunteer for Bay Elementary School annual events including the Fall Carnival 1985-1991, The Bay Auction 1988-1991, Yearbook Committee 1989-1990, Bay Cookbook fundraiser 1991, and other projects.
1988-1991	Classroom Volunteerhelped with the Project C.H.I.L.D. Kindergarten-2nd Grade Language Arts classes by setting up and maintaining computer station for students. Worked individually with student on their computer skills.
1991	"Breakfast with Bay" Event Coordinatorhelped organize a community-awareness event with tours of classrooms and presentations to area business people about the quality for education at Bay Elementary.

8. 100% Previous Broadcast Experience: Both Mark and Reneé Carter have substantial broadcast experience. The Carters' experience is as follows:

	Mark Carter
1989-1991	Broadcast Consultant for WWAV-FM Santa Rosa Beach, Floridain areas of sales, production, and management.
1985-1989	President/General Manager/Sales Manager of WWAV Santa Rosa Beach, FLresponsible for all station operations including overall sales, production, management, and engineering.
1985-1989	President of Carter Broadcasting, Inc. licensee of WWAV-FM in Santa Rosa Beach, FL. Santa Rosa Beach is a community adjacent to Miramar Beach, FL.
1984-1985	Television Account Executive at WJHG-TV in Panama City, FL owned by Grey Communications. Responsible for sales, creative origination, and production assistance of commercial accounts in both Panama City and Miramar Beach area.
1982-1984	Television Account Executive at WEAR-TV in Pensacola, Florida owned by Rollins Communications. Established successful results in Ft. Walton Beach at newly opened sales office. Responsible for sales, creative origination, and production assistance of commercial accounts in Pensacola, Ft. Walton Beach as well as Miramar Beach itself.
1980-1982	Broadcast Engineer and Announcer at WDDD-FM/WDDW-AM in Marion, IL owned by 3D Communications. Also responsible for execution of weekend newscasts and special event programming.
1980-1982	Television Producer/Director/Radio Newscaster/Reporter for WSIU-TV and WSIU-FM at Southern Illinois University at Carbondale, IL.
1979-1980	Broadcast Engineer/Newscaster at WKGC-FM at Gulf Coast Community College, Panama City, Florida.

Reneé Carter

1989-1991	Broadcast Consultant for WWAV-FM in Santa Rosa Beach, FL for station billing, traffic, and programming.
1985-1989	Business Manager/Traffic Director/Programming Director for WWAV-FM in Santa Rosa Beach, Florida. Duties included all billing, traffic, accounting, personnel, and programming responsibilities.
1985-1989	Treasurer for Carter Broadcasting, Inc licensee of WWAV-FM in Santa Rosa Beach, FL.
1985	Volunteer Talent for C.O.P.E. Center video production of three commercials produced by WKRG-TV in Mobile, AL and aired on WKRG-TV.

In addition to his extensive broadcast experience, Mark has two degrees relevant to broadcasting: a Bachelor of Science Degree magna cum laude in Radio-Television with a specialization in Sales/Management from Southern Illinois University at Carbondale in 1982, and an Associates of Arts Degree in Mass Communications with a specialization in Radio Broadcasting from Gulf Coast Community College in Panama City, Florida in 1980.

9. <u>Finder's Preference</u>: Should the Commission's reconsideration of its integration policy lead to an introduction of a credit for a finder's preference, the Carters should be entitled to such a preference based on Reneé Carter's work in having the frequency allocated to Miramar Beach.

Diversification

Neither Mark nor Reneé Carter owns any media interests.

Respectfully submitted,

MARK AND RENEE CARTER

Mark Carter

Reneé Carter

July <u>33</u>, 1993

CERTIFICATE OF SERVICE

I, Elizabeth C. Buckingham, hereby certify that a copy of the foregoing Integration and Diversification Statement of Mark and Renee Carter has been served by U.S. mail, postage prepaid, this 26th day of July 1993 on the following:

The Honorable John M. Frysiak*
Administrative Law Judge
Federal Communications Commission
2000 L Street, N.W.
Room 223
Washington, D.C. 20554

Paulette Laden, Esq.*
Hearing Branch, Enforcement Division
Mass Media Bureau
Federal Communications Commission
2025 M Street, N.W.
Room 7212
Washington, D.C. 20554

Irwin Gastfreund, Esq.
Kaye, Scholer, Fierman, Hays & Handler
The McPherson Building
901 15th Street, N.W.
Suite 1100
Washington, D.C. 20005
Counsel for Howard B. Dolgoff

Elizateth & Buckingham

*By hand